

FILED

APR 23 2002

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Stanley R. Chesler,
U.S. Magistrate Judge

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Magistrate No. 02-3058 (SRC)

ALRAHMAN MUHAMMAD NEWSOME,
and EVELYN RIVERA

I, Edgar W. Koby, Jr., being duly sworn, state the following is true and correct to the best of my knowledge and belief. Between on or about April 11, 2002 and on or about April 12, 2002, in the District of New Jersey and elsewhere, defendants ALRAHMAN MUHAMMAD NEWSOME and EVELYN RIVERA did:

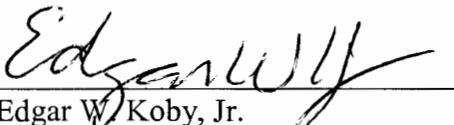
SEE ATTACHMENT A

In violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Edgar W. Koby, Jr.
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
April 23, 2002, at Newark, New Jersey

HONORABLE STANLEY R. CHESLER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

Attachment A

Knowingly and intentionally conspire and agree with each other and others to execute and attempt to execute a scheme and artifice to defraud a financial institution, namely Fleet Bank, and to obtain money, funds and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 371.

OVERT ACTS

In furtherance of the conspiracy and to effect the object thereof, the following overt acts were committed in the District of New Jersey and elsewhere:

- (1) On or about April 12, 2002, defendant ALRAHMAN MUHAMMAD NEWSOME met with defendant EVELYN RIVERA and provided her with a fraudulent New Jersey driver's license in the name of another individual but containing the photograph of defendant EVELYN RIVERA.
- (2) On or about April 12, 2002, defendant EVELYN RIVERA entered a Fleet Bank branch located in Stamford, Connecticut and using the fraudulent New Jersey driver's license provided to her by defendant ALRAHMAN MUHAMMAD NEWSOME, withdrew approximately \$4,850 from the account of an individual who maintained an account at Fleet Bank.

Attachment B

I, Edgar W. Koby, Jr., a Special Agent of the Federal Bureau of Investigation, following an investigation, am aware of the following facts:

1. Records from two Fleet Bank branches in Stamford, Connecticut indicate that on or about April 12, 2002, someone entered the Fleet Bank branches and withdrew approximately \$4,850 and \$4,950, respectively, from an account (hereinafter "Victim Account"). The Victim, a resident of the District of New Jersey, advised law enforcement authorities, in substance and in part, that the Victim Account is a joint savings account, the only signatories of which are the Victim and his/her co-signatory. The Victim further advised law enforcement authorities, in substance and in part, that neither he/she nor his/her co-signatory to the account knew defendants EVELYN RIVERA and ALRAHMAN MUHAMMAD NEWSOME and neither gave permission to defendants EVELYN RIVERA and ALRAHMAN MUHAMMAD NEWSOME to make any withdrawals out of the Victim Account.

2. Defendant EVELYN RIVERA has admitted to law enforcement authorities, in substance and in part, to making both withdrawals, and stated that in doing so, that she was provided with withdrawal slips with the name and signature of the Victim and the account number of the Victim Account by defendant ALRAHMAN MUHAMMAD NEWSOME. Defendant EVELYN RIVERA further admitted, in substance and in part, that she presented to the bank tellers a fraudulent New Jersey driver's license and Discover Card, both in the name of the Victim. Defendant EVELYN RIVERA advised law enforcement authorities, in substance and in part, that the fraudulent New Jersey driver's license and Discover Card were provided to her by defendant ALRAHMAN MUHAMMAD NEWSOME. Defendant EVELYN RIVERA further admitted, in substance and in part, that on the morning of on or about April 12, 2002, she was picked up at her residence in the District of New Jersey and driven to the Fleet Bank branches in Stamford, Connecticut by the defendant ALRAHMAN MUHAMMAD NEWSOME, during which trip he provided her with the aforementioned withdrawal slips and fraudulent identification items.

3. Inside the vehicle in which defendant ALRAHMAN MUHAMMAD NEWSOME was arrested outside one of the Fleet Bank branches on or about April 12, 2002, law enforcement authorities found, among other things, two Fleet Bank envelopes. One envelope contained approximately \$4,850, and the second envelope contained approximately \$4,950. In addition, law enforcement authorities found in the driver's side compartment, handwritten notes containing what appear to be directions to various Fleet Bank branches located in the Stamford, Connecticut area. When he was arrested, defendant ALRAHMAN MUHAMMAD NEWSOME was in the driver's seat of the vehicle. In addition, a New Jersey driver's license and a Discover Card, both in the name of the Victim, were found in the glove compartment of the vehicle.

4. At all times relevant to this complaint, Fleet Bank was a "financial institution," as defined in Title 18, United States Code, Section 20.